

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

PRIME THERAPEUTICS LLC,

Movant,

v.

CVS HEALTH CORPORATION and
CVS PHARMACY, INC.,

Respondents and
Cross-Movants.

No. 22-mc-35-WMW-JFD

**CROSS-MOTION TO TRANSFER
OR, IN THE ALTERNATIVE,
TO COMPEL PRODUCTION OF DOCUMENTS**

Pursuant to Federal Rule of Civil Procedure 45(f), Respondents CVS Health Corporation and CVS Pharmacy, Inc. (collectively, “CVS”) respectfully move this Court to transfer Movant Prime Therapeutics LLC’s (“Prime’s”) Motion to Quash Subpoena (Dkt. No. 1) to the issuing court, the United States District Court for the District of Rhode Island. The Motion to Quash is related to ongoing proceedings in five consolidated cases before the Honorable William E. Smith (Nos. 20-cv-236-WES-PAS, 1:20-cv-458-WES-PAS, 1:20-cv-507-WES-PAS, 1:20-cv-520-WES-PAS, and 1:21-cv-223-WES-PAS).

In the alternative, and pursuant to Federal Rule of Civil Procedure 45(d)(2)(B)(i), CVS respectfully moves this Court for an order to compel production of documents. Specifically, CVS respectfully moves for an order compelling production within 30 days of documents responsive to (1) the requests raised in Prime’s Motion to Quash (Nos. 2, 4, 9, 10 and 11) and (2) the request raised in CVS’s Cross-Motion to Compel (No. 16).

In support of this Cross-Motion, and in opposition to Prime's Motion to Quash, CVS attaches a supporting memorandum, declaration, and exhibits.

Dated: June 22, 2022

Respectfully submitted,

/s/ William R. Skolnick

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